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6 *Attorney for Plaintiff and all others similarly situated*

7  
8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 SHAHROOZ RAHIMIAN, individually  
11 and on behalf of all others similarly  
12 situated,

13 *Plaintiff,*

14 *v.*

15 RACHEL ADRIANO, and JUAN  
16 MARTINEZ, INC.,

17 *Defendants.*

18 Case No. 2:20-cv-02189-ART-VCF

19 **ORDER APPROVING**

20 **STIPULATION AND PROPOSED  
ORDER FOR EXTENSION OF TIME  
FOR PLAINTIFF TO RESPOND TO  
DEFENDANTS' MOTION TO  
DISMISS**

21 **(First Request)**

22 Plaintiff Shahrooz Rahimian and Defendants Rachel Adriano and Juan Martinez, Inc.  
23 d/b/a Century 21 Americana hereby stipulate, agree, and move the Court to extend the deadline  
24 for Plaintiff to respond to Defendants' motion to dismiss for good cause, in support thereof states  
25 as follows:

- 26 1. On April 6, 2022, Plaintiff filed a Second Amended Complaint in this action.
- 27 2. Defendants Rachel Adriano and Century 21 Americana's motion to dismiss the  
28 second amended complaint was filed on April 20, 2022 (ECF No. 32). Accordingly, Plaintiff's response is due on May 4, 2022.
3. Plaintiff and Defendants agree that Plaintiff shall have a two week extension of time up to and including May 18, 2022 to file a response to the motion to dismiss. The parties

1 also agree to a one week extension of time for Defendants to file their reply, up to and including  
2 June 1, 2022. This is the first request for an extension of time to respond and reply to the motion.  
3

4. The extension is requested to permit the Plaintiff and counsel sufficient time to  
5 review and appropriately respond to the opposing party's arguments.  
6

5. The stipulated extension will not prejudice the parties, nor will it impact other  
6 deadlines in this case.  
7

8 SO STIPULATED.  
9

10 Respectfully submitted,  
11

12 Dated: May 4, 2022.

13 /s/ Avi R. Kaufman  
14 Avi R. Kaufman (Florida Bar no. 84382)  
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21 *Counsel for Plaintiff and all others similarly situated*  
22

23 KAEMPFER CROWELL

24 Dated: May 4, 2022.

25 /s/ Robert McCoy  
26 Robert McCoy, No. 9121  
Ryan M. Lower, No. 9108  
Briana Martinez, No. 14919  
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4 *Attorneys for Defendants*

5 IT IS SO ORDERED.  
6   
7 Anne R. Traum  
8 UNITED STATES DISTRICT JUDGE

9 DATED: May 5, 2022